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## United States Bankruptcy Court District of Puerto Rico

IN RE:	Case No. <u>11-05121-ESL</u>
LLERA OCASIO, RAFAEL A & FABREGAS AGUILAR, ANA M	Chapter 13

Debtor(s)

### DEBTORS' MOTION REQUESTING FURTHER EXTENSION OF TIME

#### TO THE HONORABLE COURT:

COMES NOW the Debtors herein, through counsel, and very respectfully allege and pray:

- On April 12, 2012, appearing debtors requested (dckt. No. 46) and obtained an extension of time to file a stipulation with secured creditor Reo Properties. (Dckt. No. 47).
- Debtor notified the proposed stipulation to the lender, but a decision has not been taken, so debtor debtor requests a further extension of time of 10 days to inform the Court.
- On April 28, 2012, subscribing counsel tried to contact Reo Properties' counsel, Mr. Igor
   Dominguez, but he was not in the office.

WHEREFORE, it is respectfully requested from the Court that a further extension of time of 10 days be granted for debtor to file a stipulation, if any.

#### RESPECTFULLY SUBMITTED:

#### NOTICE OF TIME TO OBJECT

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f), if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. In no objection or other response if filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

#### CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I HEREBY CERTIFY that on this date copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to alejandro Oliveras, Chpater 13 Trustee, U.S. Trustee, Igor Dominguez, Esq., and other participants in such CM/ECF system. I also certify that I sent copy of the document through first class mail to the non CM/ECF participants listed in the Master Address list filed with the Clerk.

At San Juan, Puerto Rico, this 28th. day of April, 2012.

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s/Luis A. Medina Torres LUIS A. MEDINA TORRES USDC-PR 125210 Box 19II9I San Juan, PR 009I9-1191 Email: lumedina@coqui.net Tel. 765-3795, Fax 758-6000 Attorney for debtors

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FABREGAS AGUILAR, ANA M CALLE 4 D-11 URB. PARQUE DE MONTEBELLO TRUJILLO ALTO, PR 00976 REO PROPERTIES, INC. C/O IGOR DOMINGUEZ, ESQ. 1225 AVE. PONCE DE LEON, SUITE 1105 SAN JUAN, PR 00907-3945

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